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5 Attorney for Material Witnesses: MIGUEL ANGEL ALANIZ MORALES  
6 MARIA ESTHER MATA MARTINEZ  
CRISTOBAL SALAZAR FLORES  
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9 UNITED STATES DISTRICT COURT  
10 SOUTHERN DISTRICT OF CALIFORNIA  
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12 UNITED STATES OF AMERICA, ) Case No.: 08 CR 1559 H  
13 )  
Plaintiff, ) NOTICE OF MOTION AND MOTION FOR  
14 ) VIDEOTAPED DEPOSITION OF  
vs. ) MATERIAL WITNESSES MIGUEL ANGEL  
15 ) ALANIZ MORALES, MARIA ESTER MATA  
JULIO CESAR NUNEZ GOMEZ, ) MARTINEZ AND CRISTOBAL SALAZAR  
16 ) FLORES  
Defendant. )  
17 ) DATE: 6/10/08  
TIME: 2:00 p.m.  
18 ) DEPT: Porter

19 PLEASE TAKE NOTICE that on June 10, 2008 at 2:00 p.m. or as soon thereafter as  
20 counsel may be heard, material witnesses MIGUEL ANGEL ALANIZ MORALES , MARIA  
21 ESTHER ALANIZ MORALES and CRISTOBAL SALAZAR FLORES (hereafter "Material  
22 Witnesses") by and through his counsel, Wayne C. Mayer will bring a motion for a court order to  
23 take the Material Witnesses' videotaped deposition.  
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**MOTION**

Material Witnesses, pursuant to Federal Rules of Criminal Procedure, Rule 15, and Title 18 U.S.C. sec. 3144, hereby moves this court for an order to take their deposition by videotape and release them at the conclusion of the deposition. If the Court denies this motion, then Material Witnesses further requests the United States Attorney's office provide the witnesses with a Statement of Reasons in Support of Custody in accordance with Federal Rules of Criminal Procedure, Rule 46(g).

This motion is based upon this Notice, the Memorandum of Points and Authorities in Support thereof, the Declaration of Wayne C. Mayer, the files and records in the above entitled cause, and any and all other information brought to the Court's attention prior to or during the hearing on this motion.

Dated: May 22, 2008

Respectfully submitted,

s/ Wayne C. Mayer  
Wayne C. Mayer  
Attorney for Material Witnesses  
MIGUEL ANGEL ALANIZ MORALES  
MARIA ESTHER MATA MARTINEZ  
CRISTOBAL SALAZAR FLORES